United States District Court
District of Massachuoetts

Grant Boyd

V.   05-10873 RWZ

Mike Austin, et al

Plaintiff's Response to defendant's
Opposition to Plaintiff's motion to modify

The plaintiff Argues that the defendants
Objection is A mischaracterization. The Plaintiff
is only Asking to be Allowed to take depositions
From individuals who by their positions As Law
Enforcement officers have Already Sworn An oath to
Obey the Laws that Among other things ~~Prohibit~~
Prohibit FALSE Testimony. As An indigent
Prisoner-plaintiff I can not hire A court
Reporter or officer to Administer An oath and
only Ask to be Exempt From this Rule because
the dispondants have Already taken Such An oath.

Additionally Plaintiff, For the Same reasons
Above, is Asking to be Allowed to have the ~~As~~
Answers to plaintiff deposition questions be
Made in Writing if deposition is by Written
questions or by Tape Recording if deposition

(1 of 2)

.. is ORAL.

The plaintiff would still be required to comply with Notification requirements and the other provisions of Fed. R. Civ. P.

IF the Court does not allow these motified Rules the indigent prisoner-Plaintiff would be barred from taking depositions and engaging in discovery. For example, US Marshals Service has already refused to comply with document requests in a proper manner and if Plaintiff's modified Rules are not allowed discovery of Relevant facts from the USMS and P.C.S.O would not occure. Plaintiff moves the Court to grant plaintiff's motion to modify Rules.

Respectfully,   10/19/06

, 10-52

Grant Boyd A93192
PO Box 100
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RE: 05-10873-RVZ

   Plaintiff's Response to defendants objection to modify Rules
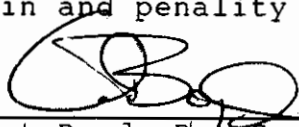
(2 of 2)

I, Grant Boyd, certify under the pain and penality of perjury
that the below list of items were mailed to the below listed
individuals by postage pre-paid first class mail on __/9__ day
of __OCToBEr__ month of 2006.

1. Plaintiff's Response to Def. objection to Modify Rules

2. _____

3. _____

4. _____

Mailed to:

1. Isabel Eonas, PCSD, 24 Long Pond Rd., Plymouth, MA 02360

2. _____

3. _____

Signed under the pain and penality of perjury.

_____   10/15/06
Grant Boyd, Pro-Se   Date